

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JENNIFER MAZZARELLO,

*

Plaintiff,

*

v.

*

Civil Action No. AMD 02 CV 3576

LUCENT TECHNOLOGIES INC.,

*

Defendant.

*

* * * * *

SECOND AFFIDAVIT OF TOM MOORE

I, TOM MOORE, do hereby depose and swear as follows:

1. I am over 21 years of age. I have personal knowledge of and am competent to testify to the matter stated herein.

2. I am the Vice President for Optical Networking Sales for Lucent Technologies Inc. ("Lucent"). From June of 2001, I served as Area Vice President in Sales Realization on the Verizon team for Lucent. Plaintiff was a member of the Verizon team during 2001 until her resignation from Lucent effective December 6, 2001.

3. During the summer of 2001, I advised Plaintiff that more technical experience would be extremely helpful if she wished to become an account executive, her stated goal. I spoke with Ed Sanford, Director of Switching Sales, who informed me that Plaintiff would indeed need more technical experience to become an account executive, whether on his team or any other team. I informed Plaintiff of my discussions with Mr. Sanford, but never once did I promise her that if she became a technical consultant, she would ultimately be made an account executive on Mr. Sanford's team.

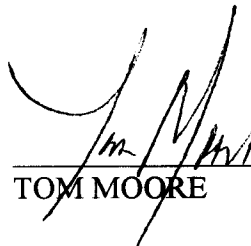
4. When I proposed the possibility of Plaintiff being made technical consultant during the summer of 2001, I did not tell her that she would remain in this role permanently. To the contrary, the goal was for her to gain technical experience and then move on to a different position. It is extremely common within the structure of Lucent for individuals to serve in certain positions for a limited period of time in order to gain skills and experience which allow them to progress within the Company. Lucent is, in the final analysis, a technically intensive company, and a lack of technical skills and experience can prevent someone from advancing within the Company.

5. The position of technical consultant within Lucent does not require either an engineering, telecommunications or computer background. To the contrary, during my years with Lucent, I am aware of numerous technical consultants who were very successful in the position and did not possess such backgrounds.

6. Mr. T.R. Maximiliano Duarte, who was employed for a period of time with Lucent as a technical consultant, was on the extreme high end in terms of technical skills and background among Lucent's technical consultants.

Pursuant to 28 U.S.C. §1746, I do hereby declare under the penalties of perjury that the foregoing is true and accurate.

Executed this 5th day of June, 2003.



TOM MOORE